

1 Christopher A. Turtzo; NV Bar No. 10253
2 **MORRIS, SULLIVAN & LEMKUL, LLP**
3960 Howard Hughes Parkway, Suite 400
3 Las Vegas, NV 89169
4 Tel: (702) 405-8100
Fax: (702) 405-8101
Email: turtzo@morrissullivanlaw.com

5 Patrick Coughlin (*pro hac vice* forthcoming)
Carmen Medici (*pro hac vice* filed)
Fatima Brizuela (*pro hac vice* filed)
Daniel J. Brockwell (*pro hac vice* filed)
**SCOTT+SCOTT ATTORNEYS AT LAW
LLP**
600 W. Broadway, Suite 3300
San Diego, CA 92101
Tel: (619) 233-4565
Fax: (619) 233-0508
pcoughlin@scott-scott.com
cmedici@scott-scott.com

7
8 [Additional attorneys listed on signature page.]

9 *Attorneys for Plaintiffs*

10
11 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

12 DANIEL ROSENBAUM; RENELDO
13 RODRIGUEZ; and THOMAS CARON,
14 Individually and on Behalf of All Others
Similarly Situated,

15 Plaintiffs,
16
17 v.
18
19 PERMIAN RESOURCES CORP. f/k/a
CENTENNIAL RESOURCE
DEVELOPMENT, INC.; CHESAPEAKE
ENERGY CORPORATION;
CONTINENTAL RESOURCES INC.;
DIAMONDBACK ENERGY, INC.; EOG
RESOURCES, INC.; HESS CORPORATION;
OCCIDENTAL PETROLEUM
CORPORATION; and PIONEER NATURAL
RESOURCES COMPANY,

20
21
22
23
24
25
26
27
28 Case No. 2:24-cv-00103

**MOTION FOR THE EXTENSION OF TIME
TO FILE PRO HAC VICE APPLICATIONS**

Defendants.

1 Plaintiffs Daniel Rosenbaum, Reneldo Rodriguez, and Thomas Caron, individually and on
2 behalf of all others similarly situated, hereby request a thirty (30) day extension of the time for the
3 following Plaintiffs' Counsel to file their *pro hac vice* applications with the Court: Patrick Coughlin,
4 Michael Srodoski, Patrick Rodriguez, and Isabella De Lisi.

5 This request is submitted in compliance with LR IA 6-1. This is the Plaintiffs' first request
6 for an extension of time. Plaintiffs filed their Complaint on January 12, 2024 (ECF No. 1). The
7 deadline for Counsel to submit their completed *pro hac vice* applications is January 30, 2024 (ECF
8 No. 2). Plaintiffs' Counsel are requesting this extension due to a delay in receiving Certificates of
9 Good Standing from each of the courts in which the attorney is admitted, which were requested
10 shortly after Plaintiffs' complaint was filed. Therefore, good cause exists for the requested extension.
11 The requested extension furthers the interest of this litigation and is not being requested in bad faith
12 or to delay these proceedings unnecessarily.

13 Accordingly, Plaintiffs respectfully request an extension of up to and including March 1,
14 2024.

15 DATED: January 22, 2024
16

17 **MORRIS, SULLIVAN & LEMKUL, LLP**

18 /s/ Christopher A. Turtzo
19 Christopher A. Turtzo; NV Bar No. 10253
3960 Howard Hughes Parkway, Suite 400
20 Las Vegas, NV 89169
Tel: (702) 405-8100
21 Fax: (702) 405-8101
turtzo@morriissullivanlaw.com

22 *Local Counsel for Plaintiffs*
23

24

25

26

27

28

1 **SCOTT+SCOTT ATTORNEYS AT LAW LLP**

2 Patrick J. Coughlin
3 Carmen Medici
4 Fatima Brizuela
5 Daniel J. Brockwell
6 600 W. Broadway, Suite 3300
7 San Diego, CA 92101
8 Tel: (619) 233-4565
9 pcoughlin@scott-scott.com
10 cmedici@scott-scott.com
11 fbrizuela@scott-scott.com
12 dbrockwell@scott-scott.com

13 **SCOTT+SCOTT ATTORNEYS AT LAW LLP**

14 Patrick McGahan
15 Michael Srodoski
16 Isabella De Lisi
17 Zachary Kranc
18 156 S Main Street
19 P.O. Box 192
20 Colchester, CT 06415
21 Tel: (860) 537-5537
22 pmcgahan@scott-scott.com
23 msradoski@scott-scott.com
24 idelisi@scott-scott.com
25 zkranc@scott-scott.com

26 **SCOTT+SCOTT ATTORNEYS AT LAW LLP**

27 Patrick Rodriguez
28 230 Park Ave., 17th Floor
29 New York, NY 11069
30 Tel: (212) 223-6444
31 prodiguez@scott-scott.com

32 *Counsel for Plaintiffs*

33 **ORDER**

34

UNITED STATES MAGISTRATE JUDGE

35 DATED: 1-31-2024
